

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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HELENA KRIZEK,

Plaintiff,

-against-

THE QUEENS MEDICAL CENTER,  
DR. CHERYLEE CHANG,  
DR. THOMAS S. GALLACHER,  
DR. NOBUHIRO ARIYOSHI,  
EDQUON LEE, ESQ.,  
MARGARET WILLE AND ASSOCIATES LLC,  
WILLIAM A. BORDNER, ESQ.,  
DR. HAO CHIH HO, LEGACY OF LIFE HAWAII,  
HAWAII STATE DEPARTMENT OF HEALTH,  
DR. CHRISTOPHER HAPPY MEDICAL EXAMINER  
OF HONOLULU, IN HIS OFFICIAL & INDIVIDUAL  
CAPACITY,

Case No. 24-cv-07727 (JHR)

**NOTICE OF DEFENDANT  
LEGACY OF LIFE HAWAII'S  
MOTION TO DISMISS**

Defendant(s).

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PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Declaration of Cathleen Kelly Rebar and the exhibits thereto, and all prior pleadings in this case, Defendant LEGACY OF LIFE HAWAII, by and through its counsel, REBAR KELLY, will move this Court, on a date and time to be determined by the Court, for dismissal of all claims against them based on the expiration of the statute of limitations and other deficiencies in pleading.

Dated: New York, New York  
November 18, 2024

Respectfully submitted,

**REBAR KELLY**



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Defendants/Third-Party Plaintiffs  
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